

SHER TREMONTE LLP

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 8/11/2022

August 9, 2022

BY ECF

The Honorable Kimba M. Wood
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Steven Brown*, S9 16 Cr. 436 (KMW)

Dear Judge Wood:

MEMO ENDORSED

I write on behalf of SAV, LLC and Marc Brown to provide a further update on the sale of the property located at 2002 4th Street, Unit 103, Santa Monica, California, 90405 (the "Santa Monica Property"), as referenced in the Court's February 19, 2021 Stipulation and Order (ECF 370).

Since our last update on July 15, 2022, we were able to resolve the title company's concerns regarding Adrian Vukovich's role at SAV, LLC. In addition, the title company requested, and the government provided, a letter confirming that, based on my firm's representation that the proceeds of the sale of the Santa Monica property will be used to satisfy SAV LLC's obligations under the Stipulation and Order, the government will provide a release of the *lis pendens* at or before closing. A copy of that August 1, 2022 letter is attached as **Exhibit A**. We believe all of the title company's issues are now resolved and there is no impediment to the closing of the sale.

I am informed that the real estate broker is in the process of trying to schedule a closing date with the buyer. While I do not have any further information at this point, I am hopeful that a closing date will be scheduled soon.

We respectfully request that the Court set a deadline of August 19, 2022 for us to provide a further update on the sale of the Santa Monica Property.

Granted.
JMW

Respectfully submitted,

/s/ Theresa Trzaskoma

Theresa Trzaskoma **SO ORDERED, N.Y., N.Y.**

8/11/2022

Kimba M. Wood
KIMBA M. WOOD
U.S.D.J.



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

August 1, 2022

BY EMAIL

Ester Reynolds, Senior Title Officer
Ticor Title Company
600 N. Brand Boulevard, Suite 610
Glendale, California 91203
Ester.reynolds@ticortitle.com
Lateaml@ticortitle.com

Re: 2002 4th Street, Unit 103, Santa Monica, California 90405

Dear Ms. Reynolds,

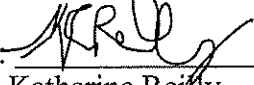
On July 8, 2016, the Government filed a notice of *lis pendens* as to the parcel of real property located at 2002 4th Street, Unit 103, Santa Monica, California 90405 (the "Santa Monica Unit"), in connection with a criminal case then-pending in the United States District Court for the Southern District of New York, *United States v. Steven Brown, et al.*, No. 16 Cr. 436 (KMW) (S.D.N.Y.). On February 19, 2021, the Honorable Kimba M. Wood entered a Stipulation and Order (the "Stipulation and Order") directing, among other things, that SAV LLC, the owner of the Santa Monica Unit, pay \$530,000 to William Busbice and Christopher and Geeta Brown to resolve competing claims to the Santa Monica Unit. SAV LLC has not yet made those payments. Since that time, SAV LLC has retained counsel, Theresa Trzaskoma, Esq. of Sher Tremonte LLP. The Government understands that the Santa Monica Unit is currently under contract, and Ticor Title Company is assisting in resolving any remaining issues regarding title prior to closing.

Sher Tremonte LLP, through Ms. Trzaskoma, has represented to the Government that the proceeds of the sale of the Santa Monica Unit will be used to satisfy SAV LLC's obligations under the Stipulation and Order in full. Specifically, the Government understands from Ms. Trzaskoma that all proceeds of the sale of the Santa Monica Unit will be transferred at the time of closing to Sher Tremonte LLP's trust account and that those funds will then promptly be paid to William Busbice and to Christopher and Geeta Brown, as provided in the Stipulation and Order. Based on those representations, the Government will provide a release of the 2016 *lis pendens* to Ticor Title Company at or before closing.

Please do not hesitate to contact the undersigned with any further questions.

Respectfully,

DAMIAN WILLIAMS
United States Attorney
Southern District of New York

By: 
Katherine Reilly
Noah Solowiejczyk
Assistant United States Attorneys
Tel. (212) 637-6521/2473

cc: Theresa Trzaskoma, Esq. (by email)